

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Azeez Salah-Al-Din Bey

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-against-

North Charleston Police Department  
Ronald Lacher  
Harold Brown

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

## Complaint for a Civil Case

Case No. 2:24-CV-7704-RMG-MGB*(to be filled in by the Clerk's Office)*Jury Trial:  Yes  No  
*(check one)*

U.S. DISTRICT COURT  
CLERK, CHARLESTON, SC  
2024 DEC 30 PM 2:39

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name  
Street Address  
City and County  
State and Zip Code  
Telephone Number

Azeel Salah-Al-Din Bey  
18 Hanover St.  
Charleston, Charleston County,  
South Carolina 29403  
803-960-6988

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name  
Job or Title  
(if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number

North Charleston Police Dept.  
2500 City Hall Ln.  
North Charleston, Charleston  
South Carolina 29418  
843-740-2800

## Defendant No. 2

Name  
Job or Title  
(if known)  
Street Address  
City and County  
State and Zip Code  
Telephone Number

Ronald Lacher  
Lieutenant  
\_\_\_\_\_

## Defendant No. 3

Name

Harold Brown

Job or Title  
(if known) Police

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

Defendant No. 4

Name \_\_\_\_\_

Job or Title  
(if known) \_\_\_\_\_

Street Address \_\_\_\_\_

City and County \_\_\_\_\_

State and Zip Code \_\_\_\_\_

Telephone Number \_\_\_\_\_

## II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (check all that apply)

Federal question

Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

### A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

The Zodiac Constitution Articles (2)(6)(7); Magna Carta Clause (39); UN Declaration on the Rights of Indigenous Peoples Article 8 (1)(a), b, d; IV Amendment

B. IF the Basis for Jurisdiction Is Diversity of Citizenship

2. The Defendant(s)

a. IF the defendant is an individual

The defendant, (name) Harold Brown, is a citizen of the State of (name) South Carolina. Or is a citizen of (foreign nation) \_\_\_\_\_.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) Azeer Sulah Al-Din Bey, is a ~~citizen~~ <sup>Sovereign National</sup> of the State of (name) North America.

**b. If the plaintiff is a corporation**

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) Ronald W. Lacker, is a citizen of the State of (name) SOUTH CAROLINA. Or is a citizen of (foreign nation) \_\_\_\_\_.

**b. If the defendant is a corporation**

The defendant, (name) North Charleston P.D., is incorporated under the laws of the State of (name) SOUTH CAROLINA, and has its principal place of business in the State of (name) South Carolina. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

### III. Statement of Claim.

On Wednesday October 12, 2022 between the hours of 6pm - 7pm, I was sitting on a bench at The Carta Superstop. Located at the intersection of Rivers Ave. & Cosgrove Ave. North Charleston, SC 29405. I was having an intellectual conversation with a beautiful woman by the name of Katrina. While talking and enjoying each others company we were waiting for our bus. At that moment a North Charleston Police Department employee was standing under a tree 15-20 Feet away eavesdropping on our conversation. While acting under Color of law he asks me to do him a favor. At which point I refused by telling him that I am not a public servant and I don't work for him, he works for me. He then approaches the bench I and Katrina were sitting on and tells me I have to leave due to an anonymous call someone made saying that I was yelling and cursing at the patrons who were passing by and also waiting on a bus. I demanded to know and see whom my accuser was. I also asked what crime I committed and why did I have to leave. Then two more North Charleston Police Department employees came from behind the building we were sitting against from the right side. All three of these police were to close to us and invading our personal space trying to intimidate us. This is

when the police in the center (Ronald Lacher says "if we didn't leave, we would be arrested." All three police acting under the Color of Law Failed to produce this so-called accuser, nor did they say what crime I had committed. They further acted under Color of law by threatening to place me in handcuffs when I stood up in front of the bench I was sitting on. I told them not to put their hands on me. I then told them to give me their names and badge #'s and cards. We both got cards, picked up our things and walked away from the Superstop. I walked away backwards off the property with Katrina behind me for our safety. When we got to the corner of the sidewalk, I noticed more N.C.P.D. employees with at least three squad cars parked along Cosgrave behind the building. Lieutenant Ronald Lacher then joined the other police along the sidewalk. When I and Katrina reached the other side of the street after going over the island, Ronald Lacher pointed to the police on his left and his right, then pointed at us as if to say, "Sick 'em." I placed Katrina behind me while we continued to walk backwards and prepared myself to stand my ground and defend myself. I was attacked by at least seven N.C.P.D. employees who then deprived me of my

rights, ; acting under Color of Law. They jumped on me, held me down, while Ronald Lacher began punching me in the Face, I was assaulted, falsely arrested, deprived of my liberty with an unlawful seizure. Kidnapped and imprisoned for 331 days. I demand this case be tried in court by a jury of my peers.

## IV. Relief

I was conspired against by 7 employees of the North Charleston Police department to deprive me of my liberty and to kidnap me. I was unlawfully detained, restrained, and arrested. I was assaulted by a mob of police who handcuffed me, took me to Sheriff Al Cannon Detention Center and falsely imprisoned for 331 days. Within this time period I suffered assault, humiliation, embarrassment, and lost wages. I suffered loss of life & liberty, depression, stress, Mental, psychological, & emotional trauma, as well as physical trauma to the head. I battle paranoia, depression, memory loss, and financial instability, after losing everything I owned. Still to this day I am constantly being stalked and harassed by the police in North Charleston and Charleston. I ask the court for damages in the amount of \$ 33,000,000 for these wrongs and for the actions of the North Charleston Police Department under the Color of law. without probable cause. This was a blatant and clear violation of my IV Amendment rights.

### 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (*explain*):

\$33,000,000 : I was falsely arrested, assaulted and kidnapped by 7 employees of the N.C.P.D. and imprisoned for 331 days.

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

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### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

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**V. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: Dec. 30, 2024

Signature of Plaintiff



Printed Name of Plaintiff

Alvarez Bey

**B. For Attorneys**

Date of signing: \_\_\_\_\_, 20\_\_.

Signature of Attorney

\_\_\_\_\_

Printed Name of Attorney

\_\_\_\_\_

Bar Number

\_\_\_\_\_

Name of Law Firm

\_\_\_\_\_

Address

\_\_\_\_\_

Telephone Number

\_\_\_\_\_

E-mail Address